

## **Exhibit 1-C**

**EXHIBIT 1-C**

**POST-PETITION FEE**

1. General tasks related to the Chapter 11 Bankruptcy Case filed by debtor				
S.JK	445.5	35.50	06/13 – 07/13: Attention to bankruptcy filing (0.4); emails to client regarding same (0.2); attention to request for notice (0.4); revise draft of request for notice (0.5); attention to filing of notices and issue related to rents (0.4); telephone call to unsecured creditor regarding claim (0.1); email to unsecured creditor regarding same (0.1); telephone call to debtor's counsel (0.1); draft email to clients regarding status (0.1); revise draft of and finalize notice regarding cash collateral (1.5); emails to client regarding filings in bankruptcy (0.1); telephone call from clients (0.1); review forms for purchase of claims (0.4); draft email to client regarding briefs (0.2); draft claims purchase agreement (0.5); telephone call to clients regarding issue related to loan (0.2); analyze issues related to restructuring note (1.20); telephone call to creditor regarding claims purchase (0.2); revise draft of claims purchase agreement (1.80); email with client regarding same (0.2); emails with client (0.1); emails regarding claim purchase (0.4); email to client regarding ERAS claim (0.4); email with client regarding various matters related to case (0.3); telephone call to client regarding various issues (0.2); analyze authorities regarding particular loan revisions in bankruptcy (0.8); telephone call to client (0.2); draft email regarding loan provision issue (0.2); telephone call to B. Healy (0.3); draft email to client summarizing call (0.4); further call from B. Healy regarding setting case (0.4); further telephone call to client regarding settlement (0.3); emails regarding	\$15,815.25

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	negotiations (0.2); review additional opposition (0.3). <b>08/13 – 09/13:</b> Review Debtor's status conference statement (0.5); attend status conference by telephone (0.7); attention to email from debtor's counsel regarding ERAS (0.3); draft status email for client (0.4); telephone call from clients regarding potential deal points (0.3); email with clients regarding status (0.2); telephone call from debtors counsel (0.2); telephone call from U.S. Trustee's attorney regarding status of case (0.2); emails regarding meetings (0.2); emails regarding setting meeting (0.2); telephone calls from client regarding various issues (0.2); email to debtor counsel (0.2); review insurance certificate (0.3); email debtor's counsel regarding same (0.1); emails regarding insurance (0.1); attention to new debtor's filings (0.2); email to client regarding same (0.1); telephone call from B. Healy (0.1); attention to finalizing letter to judge (0.2); emails regarding insurance certificate (0.2); review and revise draft of declaration (1.0); review amended petition (0.2); email to client regarding same (0.2); email to B. Healy regarding meeting (0.1); meeting with clients (0.7); revise draft of term sheet (1.5); lengthy meeting with clients, borrower and counsel regarding settlement (2.7); attend court hearing (1.0); revise draft of term sheet and email clients (1.5); revise draft of term sheet and email to client (0.2); telephone call to client (0.1); telephone call to B. Healy (0.1); revise draft of term sheet based on client input (0.5); emails regarding outstanding items (0.1); telephone call from debtor's counsel (0.2); emails regarding B. Healy request (0.1); attention to default interest calculation (0.6); emails to B. Healy regarding same and ERAS invoice (0.3); emails regarding negotiation and Rule 2004 Examinations (0.3);

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MHC	315	9.90	07/13/-08/13: Telephone conference with Attorney Kottmeier regarding Chapter 11 Plan (0.2); correspond with Attorney Kottmeier regarding same (0.1); research and analyze timing and procedure for motions regarding Chapter 11 Plan issues (1.5); advice regarding same (0.5).	\$3,118.50

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MSF		229.5	5.20	06/13 – 08/13: Communications with Attorney Kottmeier regarding same (0.3).	\$1,193.40
PRD		81	1.0	08/13: Download contents of Santa Clara government website pages for later use in proceedings, and save to server.	\$81.00
	<b>SUBTOTAL:</b>		<b>\$55.00</b>		<b>\$21,585.15</b>

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**2. Performed services related to various bankruptcy motions including seeking a determination that the stay did not apply to rents in this matter**

SJK	445.5	13.80	<b>06/13 – 08/13:</b> Attention to results of research regarding rents (0.3); review specific authorities regarding rents (0.8); attention to issue related to ownership of rents and authorities regarding same (0.4); draft client declaration in support of motion that no stay exists (1.0); revise draft of declaration and email regarding same (1.0); work on motion regarding rents (1.0); draft and add to notice of motion and motion regarding rents (1.0); attention to communications with court regarding setting hearing date (0.3); revise draft of and add to motion regarding rents (1.0); emails with client regarding motion (0.1); revise draft of memorandum (0.2); telephone call from client regarding motion (0.1); telephone call to client regarding motion and other issues (0.2); attention to issues regarding filing of motion (0.5); review opposition to motion regarding rents (0.3); review debtor's case authority regarding rents (0.3); revise draft of reply regarding motion regarding rents (0.4); attend hearing on motion regarding rents and on motion regarding use of cash collateral (2.7); meet with B. Healy after hearing (0.4); draft email to client regarding results of hearing (0.3). <b>10/13:</b> review court order regarding rents (0.4); email to client regarding same (0.2); emails with client and telephone call to client regarding rents (0.2); email to B. Healy regarding same (0.2); attention to B. Healy email regarding rents (0.4); draft emails to client (0.3); draft response to B. Healy regarding rents (0.3); emails with debtors counsel regarding rents and debtor's	\$6,147.90

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<b>3. Opposing the Debtor's inadequate applications to employ counsel resulting the Debtor providing required disclosures</b>					
SJK		445.5	3.50	07/13: Review counsel applications (0.2); email to client regarding same (0.2); telephone call from clients regarding actions to be taken (0.3); draft objection to employment of Rossi form (1.5); revise draft of objection to Goodsell firm (0.7); attention to filing of objections to counsel applications (0.2); attention to denial of orders by court regarding counsel (0.4).	\$1,559.25
JMR		405	2.50	07/13: Research and prepare objection to application to appoint general counsel for debtor.	\$1,012.50
<b>SUBTOTAL:</b>		<b>38.90</b>			<b>\$2,571.75</b>

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**4. Opposing the Debtor's initial cash collateral motion (which was denied)**

SJK		445.5	3.40	<b>06/13 - 08/13:</b> Revise draft of notice of Non Consent to Use of both Cash Collateral (0.9); and cross motion regarding use of cash (0.2); attention to points for response on cash collateral motion (0.4); review and revise draft of opposition to sue of cash collateral (1.0); revise draft of opposition to cash collateral motion (0.7); <b>10/13:</b> Attention to B. Healy email regarding cash collateral (0.1); email to client regarding same (0.1).	\$1,514.70
JMR		405	0.10	<b>10/13:</b> Advise regarding response to proposal for stipulation for use of cash collateral.	\$40.50
MHC		315	7.70	<b>08/13:</b> Review correspondence regarding cash collateral opposition (0.7); advice regarding same (0.2); review briefs (0.3); case law research regarding cash collateral in single asset real estate cases (1.0); research regarding cash collateral use (1.0); draft opposition to debtor's motion to use cash collateral (2.2); review and revise opposition to motion to use cash collateral (2.3).	\$2,425.50
<b>SUBTOTAL:</b>			11.20		\$3,980.70
<b>5. Moving for relief from the automatic stay based on the unconfirmable plan filed by the Debtor</b>					
SJK		445.5	20.80	<b>07/13:</b> Review authorities regarding amending deed of trust (0.2); draft email to client regarding stay motion regarding stay and other bankruptcy issues (0.2); formulate arguments for relief from stay (0.5).	\$9,266.40

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10/13:	Work on plan objection and motion for relief from stay (1.6); work on motion for relief from stay (1.1); draft motion for relief from stay (1.7); revise draft of and add to motion for relief from stay (3.5); review and add to motion for relief from stay (1.5); telephone conference with clients (0.3); review analysis prepared by client (0.3); telephone call to client regarding same (0.3); work on motion for relief including adding legal arguments (1.7); revise draft of and add to objection to disclosure statement (1.5); revise draft of and add to relief from stay motion (1.2); review A. Lewis transcript from useful information stay relief motion (0.5); review calculations amount due (0.2); revise draft of declaration for client (0.5); email to client regarding relief from stay motions papers (0.2); draft addition section of relief from stay motion (0.6); add to relief from stay motion (0.2); draft email to client regarding same (0.2); draft revisions to declaration for relief from stay (1.4); revise draft of relief from stay cover sheet (0.3); finalize motion for relief from stay (1.0); attention to filing same (0.2); attention to finalizing and filing motion papers for relief from stay (0.3); telephone call from client regarding same (0.2).	315	1.50	07/13 Research regarding due on sale clause and ground for relief from stay (0.8); research regarding to cram down issue (0.7).	\$472.50
MCH					
MSF		229.5	7.60	10/13: Discuss preparation of motion for relief from stay with Attorney Kottmeier (0.2); assist with motion for relief from stay (0.5); prepare cover sheet for same (0.3); prepare relief from stay cover sheet (0.4); confer with Attorney Kottmeier regarding motion for relief from stay (0.2); review and revise declaration of client in support of same (0.5); further work on declaration of	\$1,744.20

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**7. Opposing Plan filed by the debtor**

<b>SJK</b>		<b>445.5</b>	<b>14.70</b>	09/13: Review debtor's proposed plan (0.2); email to clients regarding same (0.2); prepare for hearing on motions (0.6). 10/13: Revise draft of and finalize objection to disclosure statement (0.5); review plan and begin work on objections (1.3); work on plan and disclosure statement objections (1.3); work on objection to disclosure statement and plan (1.5); research and draft objection to disclosure statement (1.5); draft objections to disclosure statement (2.0); revise draft of objections (2.0).	<b>\$6,548.85</b>
			<b>SUBTOTAL:</b>	<b>14.70</b>	<b>\$6,548.85</b>

**8. Assisting BPP in its preparation of its Proof of Claim and responding to the Debtor's objections to same**

<b>SJK</b>		<b>445.5</b>	<b>7.30</b>	09/13-10/13: review and revise draft of proof of claim (1.4); revise draft of and add to proof of claim (1.5); email to client regarding proof of claim (0.2); revise draft of and add to declaration and proof of claim (1.5); revise client declaration and attachment to proof of claim (0.6); email to client regarding same (0.2); email to client regarding items related to proof of claim (0.1); telephone call with client regarding proof of claim and declaration (0.2); attention to objection to claim (0.2).	<b>\$3,252.15</b>
<b>MSF</b>		<b>229.5</b>	<b>4.80</b>	09/13 – 10/13: Research factual background for claim (0.2); review loan documentation (0.2); draft and revise Attachment A narrative for proof of claim (0.5); review Attachment A to proof of claim (0.3); review and revise proof of claim form and send	<b>\$1,101.60</b>

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## **9. Moving for Rule 2004 examinations and opposing and responding to debtors Rule 2004 application**

SJK		445.5	28.90	<b>07/13 – 08/13:</b> Analyze subordination issue and Rule 2004 scope (0.2); draft email to client regarding same (0.2); draft and revise email to client on issues related to Rule 2004 (0.8); draft Rule 2004 examination applications (1.0); revise drafts of same (1.0); draft supporting declarations and order (1.0); revise draft of and add to Rule 2004 examination requests (1.9); email to client regarding application (0.2); attention to email from U.S. Trustee and draft response (0.2); revise draft of Rule 2004 application form (0.6); revise draft of supporting declaration (0.6); email to client regarding same and regarding trustee's sale issue (0.2); revise draft of declaration for 2004 examinations (0.6); revise	\$12,874.95
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	<p>draft of and add to Rule 2004 application (1.5); draft email to client regarding same (0.2); telephone call from client regarding Rule 2004 examinations (0.2); revise draft of and add to Rule 2004 form (1.2); prepare multiple application forms (0.8); finalize Rule 2004 applications (0.3); attention to opposition to Rule 2004 examinations and reply points (0.7); revise and add to reply re Rule 2004 examinations (0.7); emails regarding meeting ERAS (0.5); review and add to Rule 2004 Application regarding ERAS (0.5); review and revise draft of reply memorandum (0.5); attention to finalizing Rule 2004 Application (0.5); attention to setting hearing on Rule 2004 Applications (0.3); attention to direction regarding Rule 2004 Exams and email to client regarding same (0.3); review debtors Rule 2004 request (0.3); telephone call from client (0.2); various calls and emails with client (0.2); attention to responding to Rule 2004 Application (0.2); telephone conference with debtor's counsel regarding Rule 2004 Applications (0.3); revise draft of and finalize opposition papers (2.5); draft and revise letter to court (1.3); email to debtor's counsel regarding meet and confer letter for court (0.2); draft email to client regarding opposition to Rule 2004 Examination (0.3); prepare for argument regarding Rule 2004 Examination requested by BPB (0.5); attention to declaration filed by B. Healy (0.3); attend hearing regarding Rule 2004 Examinations (1.0); draft email to clients regarding same (0.2); email to B. Healy regarding discovery requests to BPB (0.2); emails with client (0.2); emails with debtor's counsel and client (0.2); review motion opposition (0.2); telephone call from with B. Healy (0.2); revise draft of agenda (0.5); email regarding same (0.2); revise draft of agenda (0.2); prepare for hearings</p>

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<b>JMR</b>				

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MHC	315	19.20	Lewis (0.2); telephone conversation with client regarding strategy and status related to 2004 Exam for client documents (0.2); telephone conversation and correspond with client regarding document search (0.4); telephone conversation with client regarding same and strategy (0.4).	<b>07/13 – 09/13:</b> Correspondence with Attorney Kottmeier regarding case law analysis and results (0.3); review objection to 2004 examinations and state court reply brief (0.5); advice regarding reply to 2004 application (0.2); draft reply to opposition to Rule 2004 application, including case law research (4.3); review and revise reply (0.4); prepare to file and serve same (0.2); telephone and correspondence with B. Healy regarding status (0.2); review amended objection to 2004 examinations (0.2); instructions to staff regarding same (0.2); review correspondence regarding 2004 Examination hearing (0.5); review 2004 Application by debtor for Boston Private Bank (0.5); advice regarding opposition to 2004 Exam (0.3); legal research regarding scope of 2004 Examinations (2.0); draft legal argument regarding same (3.5); review and revise correspondence regarding meet and confer for 2004 hearing (0.3); review and revise objection to 2004 Application (2.0); additional legal research regarding same (1.7); review correspondence regarding 2004 Examination Order (0.1); correspondence with Client regarding document review (0.2); confer with Attorney Kottmeier regarding same (0.1); attention to documents from bank for document review (0.2); correspondence with Attorney Ross regarding scope (0.1); advice regarding document review, scope (0.1); research regarding subpoena for 2004 Exam (0.2); prepare to serve	<b>\$6,048.00</b>

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<b>10. Preparing for and conducting the initial session of the examination of the Debtor's managing member Andrew Lewis</b>				
<b>SJK</b>	<b>445.5</b>	<b>12.10</b>	<b>09/13 – 10/13:</b> Attention to status of issues (0.2); attention to materials for deposition (0.2); prepare for deposition (0.6); prepare for deposition (0.8); telephone call from B. Healy (0.3); prepare for deposition (0.8); review authorities regarding right to default interest (0.3); attention to emails for use in deposition (0.3); prepare for deposition (0.8); attention to client's email files (0.3); prepare for deposition; take deposition of A. Lewis (2.7); review produced documents (1.0); further examination of A. Lewis (2.0); meeting with client, A. Lewis and B. Healy regarding settlement following Rule 2004 Exam (1.0).	<b>\$5,390.55</b>
<b>JMR</b>	<b>405</b>	<b>1.80</b>	<b>09/13 – 10/13:</b> Advice regarding strategy for execution (0.2); correspond with client regarding e-mail search and production	<b>\$729.00</b>

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MSF			(0.2); correspond with client regarding e-mail searches (0.2); attention to issues regarding same (0.2); review and analyze documents and e-mails related to Lewis Examination (1.0).	\$1,377.00
	229.5	6.00	<b>09/13 – 10/13:</b> Communications with Attorney Kottmeier regarding preparation for A. Lewis' Rule 2004 Examination (0.2); prepare documents for same (1.0); communications with Attorneys Kottmeier and Ross regarding Andrew Lewis Rule 2004 Examination (0.4); review client files for documents (0.8); discuss with Attorney Ross and review same (0.2); attend portion of A. Lewis Rule 2004 Examination regarding electronic records production (1.0); review cd produced by A. Lewis and compile potential deposition exhibits from his files for Attorney Kottmeier and client review (0.9); document and deposition exhibit organization (1.0); attend to A. Lewis deposition materials (0.2); attend to deposition exhibits (0.3).	
PRD		81	2.30	<b>09/13 – 10/13:</b> Download zip files of client documents, sort on electronic database (0.5); load files to electronic database (0.2); load A. Lewis deposition transcripts to electronic database (0.2); load A. Lewis deposition exhibits to electronic database (0.2); create exhibit binders and deposition transcript binders (0.9); load video file of A. Lewis to electronic database (0.3).
			22.20	\$7,682.85
			<b>SUBTOTAL:</b>	
<b>TOTALS:</b>		<b>Blended Rate</b>	<b>Hours Billed</b>	<b>Value</b>
			268.50	\$105,797.70